

Suggested Survey Questions/Topics for Upcoming OECA Training

1. **A general overview of OECA's authority in implementing air regulations includes, but is not limited to, the following questions. Select the topics of interest.**
 - a. How is a rule enforced?
 - b. Is there a general compliance checklist available?
 - c. How does OECA determine which source categories to target for inspection?
 - d. What happens when a facility is found in violation of a regulation?
 - e. When is a notice of violation (NOV) issued? What steps are required to issue a NOV? How does OECA handle a permit deviation versus an emission standard violation? Who issues the NOV? When does the agency pursue a citation resulting from a NOV?
 - f. What is enforcement discretion? When is it taken? Who has the authority to issue enforcement discretion?
 - g. What role may a rule-writer play, if any, in the decision-making process for issuing a NOV or exercising enforcement discretion?
 - h. Any additional topic(s)?
2. **Are you interested in OECA's statutory authority under the different sections (e.g., 111, 112, 129) of the CAA? Does its role change from section to section?**
3. **Are you interested in the latest guidance on SSM's impact on enforcement (e.g., malfunctions vs. limits apply at all times)?**
4. **Are you interested in the impacts of the Once-in-Always-in reversal? (Now referred to as MM2A)**
5. **Delegation - select the topics that interest you.**
 - a. What are the impacts of using the incorrect delegated authority terminology in our regulatory text?
 - b. How should the delegated authority be determined?
 - c. Explain EPA's Delegations of Authority Manual, how it may be useful to rule writers and where it may be found?
 - d. Case studies and examples
 - e. Other topics?
6. **Applicability Determination (AD) - check the topics that interest you.**
 - a. What is an AD, when is EPA required to issue an AD and who has the authority to do an AD?
 - b. What is the procedure for doing an AD?
 - c. What role does a rule writer play in applicability determinations?
 - d. What is an AD Index (ADI) ?
 - e. How ADs may impact future rulemakings

- f. AD Process Lean
 - g. How is regulatory interpretation different from applicability determination?
 - h. Discuss 1999 AD and Alternative Monitoring Manual
- 7. Do you want the training to include the following topics? Please select from the following options. You can select multiple options.**
- a. ICR Renewals
 - b. Compliance assistance efforts that include a third party to be trained by OECA (e.g., Oil and Gas rule may employ a third party to oversee compliance)
 - c. Request for alternative monitoring or site-specific monitoring. How to review an alternative monitoring request
 - d. OECA's tips on writing better enforceable rules
 - e. Specific training OECA conducts for rule implementation
 - f. How the Regional Offices' enforcement authorities work with OECA to implement and enforce air regulations
 - g. Any additional topic(s)?